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Lead Defense Counsel for Personal
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

IN RE: TOYOTA MOTOR CORP.
UNINTENDED ACCELERATION
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

Case No. 8:10ML02151 JVS (FMOx)

**STIPULATION REGARDING
SOURCE CODE PROTOCOL**

This document relates to:

ALL CASES

WHEREAS, the parties previously submitted an Order Re Stipulation Re Briefing on Source Code Protocol which was entered by the Court on January 11, 2011 (Dckt. 604);

WHEREAS on January 25, 2011, the Parties continued their meet and confer efforts on the source code protocol;

WHEREAS, it was determined that additional time would be needed for the source code hearing; and

WHEREAS, the Parties are working together in good faith to continue to negotiate a source code protective order and protocol, and have therefore agreed that the issue of source code protection and production should be removed from the calendar for the MDL hearing scheduled for February 18, 2011 at 3:00 p.m.

IT IS HEREBY STIPULATED by and between the parties, through their attorneys, that upon this Court's entry of an Order approving this Stipulation:

1. The Parties will brief for the Court any issues that remain open or in dispute after continued good faith negotiations on February 18, 2011 with concurrent opening briefs only; and

2. The parties will present oral argument at a hearing before the Court on February 25, 2011 at 9:30 a.m.

Dated: January 26, 2011

By: /s/ Mark P. Robinson, Jr.
Mark P. Robinson, Jr.

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1 Dated: January 26, 2011

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